

EXHIBIT

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION PLAINTIFF
VERSUS CIVIL ACTION NO: 07-CV-05944-SC; MDL NO.1917
THIS DOCUMENT RELATES TO:
ALL INDIRECT PURCHASER ACTIONS DEFENDANT

DEPOSITION OF DOUGLAS W. ST. JOHN

Taken at 4302 W. Beach Boulevard,
Wingate Beach Hotel, Gulfport, Mississippi,
Monday, November 2, 2015, beginning at 10:02 a.m.

APPEARANCES:

REPRESENTING PLAINTIFF:

MARK J. SCHIRMER, ESQUIRE
Straus & Boies, LLP
1355B Lynnfield Road, Suite 245
Memphis, Tennessee 38119
mschirmer@straus-boies.com

REPRESENTING DOUGLAS W. ST. JOHN:

JOSEPH SCOTT ST. JOHN, ESQUIRE
514 Mockingbird Drive
Long Beach, Mississippi 39560
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REPORTED BY:

JENNIFER RAY, CCR, RPR
CCR # 1419

1 DOUGLAS W. ST. JOHN

2 the witness, having been produced and
3 first duly sworn, testified as follows, to-wit:

4 EXAMINATION

5 BY MR. SCHIRMER:

6 Q. Would you, please, state your name for
7 the record, sir.

8 A. Douglas Wayne St. John.

9 Q. Do you have a lawyer with you
10 representing you here today?

11 A. Yes. Joseph St. John.

12 Q. Okay. Do you know of any other
13 counsel who is representing you in connection
14 with your -- with the reason you're here today?

15 A. No.

16 MR. JOSEPH ST. JOHN: Counsel, for the
17 record, can you state who you are representing?

18 MR. SCHIRMER: Sure. I represent -- I
19 am one of the attorneys who represents a class of
20 indirect-purchaser parties in the in re (CRT)
21 cathode ray tube antitrust litigation. I'm from
22 the firm Straus and Boies.

23 MR. JOSEPH ST. JOHN: Okay. Counsel,
24 for the record, I'm objecting to your
25 qualifications to take the deposition. Post

1 Q. And you said that your son told you
2 about the litigation?

3 A. Yes.

4 Q. And informed --

5 MR. SCHIRMER: Object to form.

6 BY MR. JOSEPH ST. JOHN:

7 Q. And informed you that you might be a
8 class member?

9 A. Yes.

10 MR. SCHIRMER: Object to form.

11 BY MR. JOSEPH ST. JOHN:

12 Q. Whose idea was it to object to this
13 litigation?

14 A. Mine.

15 MR. SCHIRMER: Object to form.

16 BY MR. JOSEPH ST. JOHN:

17 Q. Why did you feel the need to object?

18 A. The original -- when they set up the
19 cartel -- you can say it was a very small amount
20 or whatever, but all the people who bought
21 cathode ray tubes, whether they be TV, computer
22 monitors or whatever, those people got cheated.
23 Looking at the amount of the settlement request
24 by the attorneys, they are about to get cheated
25 again, and I think that is unfair, so that is

1 what my objection is.

2 Q. And do you recall specifically what
3 you've said that led down this path to filing the
4 objection?

5 MR. SCHIRMER: Object to form.

6 A. Is there some -- there should be some
7 way to object to the size of the settlement, and,
8 yes, you can object to it.

9 BY MR. JOSEPH ST. JOHN:

10 Q. That was the answer?

11 A. That was -- that was -- how -- how do
12 I object, yes, you can object to the size --
13 since you are in the -- since you're one of the
14 people that got cheated, you can object to the
15 settlement.

16 Q. Mr. St. John, you were asked by
17 opposing counsel if I had ever served as your
18 lawyer before. Do you recall that question?

19 A. Yes.

20 Q. And you said -- forgive me for
21 paraphrasing -- but you thought this was the
22 first time?

23 A. Okay. Yes.

24 Q. Did you ever ask me for legal advice
25 in connection with the land for which you were a

1 trustee in Alabama?

2 A. Yes.

3 Q. And did I provide legal advice to you?

4 A. Yes.

5 Q. Have you ever asked me for legal
6 advice in connection with a trust or estate
7 matter?

8 A. Yes.

9 Q. Did I provide legal advice to you?

10 A. Yes.

11 Q. You testified that you have hired and
12 paid an attorney in connection with some real
13 estate matters?

14 A. Yes.

15 Q. And did you view that attorney's work
16 as yielding you a great result? Let me be more
17 specific.

18 Correct me if I'm wrong. You retained
19 an attorney in connection with an oil or gas
20 company wanting an easement onto your land?

21 A. Yes. Yes. And I received
22 satisfactory results from that.

23 Q. Did you view that as a good or great
24 result?

25 MR. SCHIRMER: Objection to form and